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Transok, Inc.

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Tulsa, Oklahoma 74101
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Dockets Unit, Room 8417,
Research and Special Programs
U.S. Department of Transportation
400 Seventh Street, Southwest
Washington, D. C. 20590

November 25, 1991

Attention: MR Cesar DeLeon

RSPA-98-4868-31

RE: Gas Gathering Line Definition
Docket No. PS-122, Notice 1

Dear Mr. DeLeon:

In accordance with Research and Special Programs
Administration's ("RSPA") Notice of proposed rulemaking published
in the Federal Register on September 25, 1991, Transok, Inc.
submits the enclosed comments in the above-docketed proceeding.

Please stamp the enclosed acknowledgment copy of this
transmittal and comments and return it to the undersigned in the
enclosed postage paid envelope,

If there are any questions concerning these comments, please
contact the undersigned,

Sincerely Yours,

Transok, Inc.

Keith M. Sappenfield, II

Keith M. Sappenfield, II
Manager, Rates

(713) 272 - 5008

cc: Earl Glimp
Jerry McDaniel
Mike Palmer

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UNITED STATES OF AMERICA
BEFORE THE

RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
DEPARTMENT OF **TRANSPORTATION**

Gas Gathering Line Definition)
Docket No. PS-122)

COMMENTS OF TRANSOK, INC.

Pursuant to the **commentprocedures** in the Notice of Proposed Rulemaking ("NOPR") published September 25, 1991 by the Research and Special **Programs** Administration ("**RSPA**") of the **Department** of Transportation ("**DOT**") in the Federal Register for the captioned docket, Transok, Inc. and its affiliates ("**Transok**") files these comments:

INTRODUCTION

Transok is engaged in the transportation of natural gas in the states of Louisiana, Oklahoma and Texas. Transok constructs and operates its gathering and intrastate transmission facilities in accordance with the laws, rules and regulations of the state and local jurisdictions where the facilities are located, Transok also perform services on its intrastate pipeline facilities pursuant to section 311 of the Natural gas Policy Act of 1978 ("**NGPA**") for delivery to several interstate pipelines.

All communication and **correspondence** with respect to these comments should be addressed to the following **persons**:

Keith M. Sappenfield, II, Manager Rates
Transok, Inc.
P.O. Box 3008
Tulsa, Oklahoma 74101

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Transok, Inc.
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SUMMARY OF COMMENTS

The NOPR proposes to **revise** the definition of the term **"gathering line"** under the Natural Gas Pipeline safety Act of 1968 (49 App. **U.S.C. 1671**, et seq.) ("the Act") **so** that the beginning and end of a gas gathering line are clearly described. The regulations implementing the Act are promulgated at 49 **CFR 192**. **RSPA** states that **determining** the beginning and ending points under the current definition is confusing. **Also**, the **NOPR** **proposes** to define the **terms** "production **facility**" and "production field".

Transok's comments **will** focus **on** the proposed definition for **"gathering line"** as they apply to facilities that are determined **to be gathering** by an order **of** either the Federal Energy Regulatory Commission, a **state** public utility commission, a **Estate court, or** federal court. **RSPA** **should** clarify the proposed **definition of** "gathering line" **to reflect orders of** any agency or **court** having jurisdiction. **Where a** order of an agency or **court has** determined a facility to be a "gathering line", the agency **or** court did **so** only after reviewing the configuration and operations **of** such **faoilty**, and applying the **laws**, rules and regulations governing **such determination**. In addition, if the facility **were** not a "gathering **line**" the facility would be found

to be either a intrastate pipeline or interstate pipeline, which, in most cases, are currently subject to the pipeline safety standards of the Act.

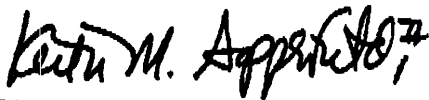
Transok suggests that the **proposed** definition of "gathering line" be **revised** to reflect **orders of** either the Federal Energy Regulatory **Commission**, a state public utility **commission**, a **state court, or a** federal court where a **facility** is determined to be gathering. Transok **encloses** as Exhibit I. a modified proposed definition which includes changes to the **definition** language to reflect our suggested revision,

CONCLUSION

Transok respectfully urges the **Commission** to **include** in its final rule a **revised** definition of the term "gathering line" which **reflects** determination of gathering line by either the **Federal** Energy Regulatory Commission, a state **public** utility **commission**, a state court, **or a** federal court.

Respectfully Submitted,

Transok, Inc.



Keith M. Appenfield, II
Manager Rates

Telephone: (918) 583 - 1121

Dated: November 25, 1991

§ 192.3 Definitions

* * *

Gathering Line means, except as provided in paragraph ~~(4)~~ **(5)**, any pipeline or part of a **connected** series of pipelines used to transport gas from **a well or the first production facility** where gas is separated from produced hydrocarbons, whichever is farther **downstream**, to **an** applicable end point described in paragraphs **(1), (2), (3) or (3) (4)** below:

(1) The inlet of the first natural **gas** processing plant used to remove liquefied petroleum gases or other natural **gas** liquids.

(2) If there **is** no natural gas processing plant, the point where custody of the **gas** is transferred to others who transport it by pipeline to:

- (i) A distribution center; or
- (ii) A gas storage facility; or
- (iii) **An** industrial consumer.

(3) If there **is** not natural **gas** processing plant or point where custody of the gas is so transferred, the last point downstream where gas produced in the same production field **or two adjacent fields** is **commingled**.

~~(4) The point where custody of the gas is transferred from a facility(ies) determined to be gathering facility(ies) by an order of either the Federal Energy Regulatory Commission, a state public utility commission, a state court, or a federal court.~~

~~(4) (5)~~ A gathering line does not include **any** part of a pipeline that **transports gas** downstream -

- (i) From **the** end points in **(1), (2), (3), or (3) (4)** in this definition; or
- (ii) **From** a production **facility**, if no end points exists; or
- (iii) In any interstate transmission **facility** subject to the **jurisdiction** of the Federal Energy Regulatory Commission under the Natural Gas Act (15 U.S.C. 717 *et seq.*)

* * *